

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NASIM GHEBARI,

Plaintiff,

v.

NATIONAL GAS AND ELECTRIC, LLC and
JOHN DOES 1-10,

Defendants.

Case No: 1:19-cv-01218

Honorable Judge Robert M. Dow, Jr.

**AGREED MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT’S
MOTION FOR SUMMARY JUDGMENT**

NOW COMES Nasim Ghebari (“Plaintiff”), by and through his counsel, Sulaiman Law Group, Ltd., moving this Honorable Court to extend time for Plaintiff to file his response to Defendant National Gas and Electric, LLC (“Defendant”) Motion for Summary Judgment, and in support thereof, stating as follows:

1. On June 6, 2019, Defendant filed its Motion for Summary Judgment. [Dkt. 27].
2. On July 8, 2019, this Honorable Court scheduled for Plaintiff’s Rule 56(d) affidavit to be filed July 26, 2019 and Defendant’s response on August 9, 2019. [Dkt. 33].
3. Although Plaintiff’s counsel has given priority to the finalization of his summary judgment response brief, due to competing deadlines, Plaintiff is unable to file his Rule 56(d) Affidavit by the deadline set forth by this Honorable Court.
4. Counsel for Plaintiff conferred with Defendant’s counsel regarding an extension of the deadline and Defendant has no objection to the relief requested herein.
5. Plaintiff is seeking an extension up to and including August 13, 2019 to file his response to Defendant’s Motion for Summary Judgment.

6. Plaintiff's seeks this extension in good faith and no party will be prejudiced by the extension.

7. The extension of time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation.

8. The parties also agree to extend the deadline for Defendant's reply brief accordingly. The due date for Defendants' response should be extended 14-days to be due August 27, 2019.

WHEREFORE, Plaintiff respectfully requests that this Court extend the deadline to file his response to Defendant's Motion for Summary Judgment through August 13, 2019, and extend Defendant's time to submit its response through August 27, 2019.

Date: July 26, 2019

Respectfully submitted,

/s/ Marwan R. Daher
Marwan R. Daher
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CERTIFICATE OF SERVICE

I, Marwan R. Daher, an attorney, certify that on July 26, 2019, I caused the foregoing **AGREED MOTION TO EXTEND PLAINTIFF'S RULE 56(D) AFFIDAVIT** to be served upon counsel of record through operation of the Court's Case Management/Electronic Case File (CM/ECF) system.

/s/ Marwan R. Daher
Counsel for Plaintiff